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August 9, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**BY HAND DELIVERY**

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, DC 20554

Re: Amendment of Section 73.622(b),
Table of Allotments
Digital Television Broadcast Stations
(Charleston, South Carolina)
MM Docket No. 01-128; RM-10133

Dear Ms. Salas:

Transmitted herewith on behalf of Grant Video Inc. are an original and four copies of its Comments in the above-referenced allotment rulemaking proceeding.

Should any questions arise concerning this matter, please communicate directly with the undersigned.

Very truly yours,

DICKSTEIN SHAPIRO MORIN
& OSHINSKY LLP

Andrew S. Kersting
Counsel for
Grant Video Inc.

Enclosure

cc: Certificate of Service (w/ encl.) (by hand & first-class mail)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.622(b),)	MM Docket No. 01-128
Table of Allotments,)	RM-10133
Digital Television Broadcast Stations.)	
(Charleston, South Carolina))	

To: Chief, Video Services Division

COMMENTS OF
GRANT VIDEO INC.

Grant Video Inc. ("Grant"), by counsel and pursuant to Section 1.415 of the Commission's rules, hereby submits its comments in response to the *Notice of Proposed Rule Making*, DA 01-1465 (released June 25, 2001) ("NPRM"), in the above-captioned proceeding which proposes to substitute DTV Channel 47 for DTV Channel 52, which has been assigned to Station WCSC-TV, NTSC Channel 5, Charleston, South Carolina. In support of these comments, the following is stated:

I. Introduction and Summary.

In response to a Petition for Rulemaking filed by WCSC, Inc. ("WCSC"), licensee of Station WCSC-TV, the *NPRM* proposes to substitute DTV Channel 47 for DTV Channel 52 at Charleston. However, the proposed substitution of DTV Channel 47 at Charleston is short-spaced to a pending application for a new NTSC station to operate on Channel 47 at Columbia, South Carolina, which was filed by Fant Broadcast Development, L.L.C. ("Fant") on July 22, 1996 (File No. BPCT-19960722KG). After

pending at the Commission for nearly five years, Fant's Columbia application was accepted for filing on May 25, 2001, and the Commission has solicited the filing of additional competing applications for the proposed Columbia facility.¹

As demonstrated herein, the pending allotment proposal to substitute one DTV channel for another at Charleston should be required to protect Fant's application for the new Columbia station, which would provide substantially greater public interest benefits than the pending allotment proposal. However, even assuming, *arguendo*, that the Commission were to conclude that the Charleston DTV allotment proposal is not required to protect Fant's Columbia application, the Commission should permit the competing applications for the Columbia NTSC station to proceed to auction and provide notice to those applicants that any authorization issued for the new Columbia station would be conditioned upon the acceptance of predicted interference from the proposed co-channel DTV facility in Charleston.

II. Procedural History.

As stated above, Fant filed an application for a new NTSC station to operate on Channel 47 at Columbia, South Carolina, on July 22, 1996. Because the city of Columbia is located within a "freeze area," Fant's application was subject to the FCC's 1987 Freeze Order.² On May 25, 2001, prior to the issuance of the *NPRM* in this proceeding, the

¹ See *Public Notice*, DA 01-1300 (released May 25, 2001) ("Auction Filing Window for New Analog Television Stations – Auction No. 82") (*"Auction 82 Notice"*). Grant filed an application for the proposed Columbia NTSC station in response to the *Auction 82 Notice* on June 27, 2001.

² In July 1987, the FCC adopted an order which placed a freeze on the filing of petitions for rulemaking and applications for new NTSC stations in areas surrounding 30 major television markets. See *Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, Mimeo No. 4074, RM-5811 (released July 17, 1987) ("Freeze Order").

FCC issued the *Auction 82 Notice* which announced an auction filing window for new analog television stations, including the proposed new station at Columbia. On June 20, 2001, WCSC filed a “Petition for Partial Rescission or Clarification of Auction Public Notice, and for Expedited Processing of Rule Making Petition” (“Petition for Partial Rescission”), in which WCSC argued that the Commission should either (i) rescind the *Auction 82 Notice* to the extent that it listed Fant’s pending application and solicited competing applications for the proposed new NTSC station at Columbia, or (ii) in the alternative, that the FCC give notice to Fant (and all other potential bidders for the new Columbia NTSC station) that any authorization issued for the proposed Columbia station would be conditioned upon the acceptance of interference from WCSC’s proposed operation of Station WCSC-DT on Channel 47 at Charleston. Petition for Partial Rescission, p. 6. The FCC issued the *NPRM* in this proceeding several weeks later, on June 25, 2001.

III. Fant’s Columbia Application is Entitled to Protection From WCSC’s Allotment Proposal.

In the *Sixth Further Notice* in MM Docket No. 87-268,³ the FCC established a deadline for filing applications for new NTSC stations of September 20, 1996.⁴ With respect to pending NTSC applications and those applications that would be filed before the deadline, the Commission stated as follows:

As we process the applications on file now and those that are filed before the end of this filing opportunity, we will continue our current policy of considering requests for waiver of our 1987 freeze Order on a case-by-case basis. *When applications for new stations are accepted for*

³ *Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, MM Docket No. 87-268, *Sixth Further Notice of Proposed Rule Making*, 11 FCC Rcd 10968, 10992 (1996) (“*Sixth Further Notice*”).

⁴ *Id.*; see also 61 Fed.Reg. 43209 (August 21, 2001).

filing, we will continue our process of issuing Public Notices that “cut-off” the opportunity for filing competing, mutually-exclusive applications. In connection with these cut-off notices, we will allow additional competing applications to be filed after the end of this filing opportunity.

11 FCC Rcd at 10992 (emphasis added) (footnote omitted).

Although the *Auction 82 Notice* is not explicit with respect to the current status of Fant’s pending application, the above excerpt from the full Commission’s *Sixth Further Notice* makes clear that applications such as Fant’s will not be placed on a “cut-off” notice inviting the filing of additional competing applications until the application has been “accepted for filing.”⁵ WCSC itself acknowledges that “the placement of a television application on a public notice that solicits mutually exclusive applications signifies acceptance of the lead application for filing.” *Petition for Partial Rescission*, p. 5. Indeed, it would make no sense whatsoever for the Commission to open an auction filing window by listing applications for new stations on a public notice, solicit the filing of additional competing applications for those facilities, hold an auction for the proposed new broadcast facilities, and later determine that the lead applicant’s application (as reflected on the auction public notice) and, ultimately, the winning bidder’s long-form 301 application, are not acceptable for filing. Thus, there is no merit to WCSC’s contention that Fant’s application for a new NTSC station at Columbia has not been accepted for filing.⁶

⁵ The FCC’s CDBS indicates that Fant’s application has been “tendered for filing.” However, the status of Fant’s pending application, as entered into the FCC’s CDBS system by the FCC’s processing line, cannot supersede the express language of the full Commission in the *Sixth Further Notice* regarding the procedures to be followed in processing Fant’s application.

⁶ See *Petition for Partial Rescission*, p. 5. Although WCSC makes much of the fact that Fant’s Columbia application requested a new station within an area subject to the 1987 Freeze Order (see *Petition for Partial Rescission*, pp. 2-3), the fact that Fant’s application constituted a “freeze waiver” application is now moot because the application has been processed and accepted for filing in accordance with the processing procedures established in the *Sixth Further Notice*. 11 FCC Rcd at 10992.

In a Commission order released earlier this year concerning its biennial review of the rules and policies affecting the conversion to digital television,⁷ the FCC adopted a system of priorities similar to that which was adopted in its rulemaking proceeding establishing a Class A television service. Specifically, the Commission stated as follows:

. . . [W]e give priority to *DTV expansion applications* over all NTSC applications except NTSC applications that fall into one of the following three categories: post-auction applications, applications proposed for grant in pending settlements, and any singleton applications cut-off from further filings. These NTSC applications must have been accepted for filing in order to be protected from *DTV expansion applications*. In the future, when a party files a *DTV expansion application*, it must determine whether there are NTSC applications on file in any of the three above categories and provide interference protection to them.

Id. at ¶52 (emphasis added) (footnotes omitted). In establishing these priorities, the Commission concluded that its priority system would further its overriding goal of expediting the implementation of DTV service. At the same time, however, the Commission recognized the need to:

. . . continue to provide viable NTSC service until the DTV transition is complete and not [disrupt] the settled expectations of these NTSC applicants that may have relied on existing procedures in the reasonable belief that their applications would receive protection.

Id.

The priority system established by the Commission in the *Biennial Review Order* does not govern the apparent conflict between Fant's Columbia application and WCSC's allotment proposal. As stated above, Fant's application has been accepted for filing and placed on a public notice which invited the filing of additional competing applications for the Columbia NTSC facility. However, Fant's application does not fall within any of the

⁷ *Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, Report and Order and Further Notice of Proposed Rule Making*, MM Docket No. 00-39, FCC 01-24 (released January 19, 2001) ("*Biennial Review Order*").

three categories established by the Commission which are expressly entitled to a priority over “DTV expansion applications.”⁸

WCSC’s allotment proposal also does not fall within the priority system established in the *Biennial Review Order* because it does not constitute a “DTV expansion application.” The reference facilities for WCSC’s proposed digital operation on Channel 47 at Charleston are identical to those for WCSC-DT’s existing DTV Channel 52 allotment.⁹ Moreover, in its pending application specifying a digital operation on Channel 47 at Charleston, WCSC has proposed to operate at a height of only 521 meters above average terrain, which is the same antenna height specified in Station WCSC-DT’s construction permit authorizing its operation on DTV Channel 52. *See* File Nos. BPCDT-20000501ADT; BPCDT-19991028AFK. Therefore, WCSC’s allotment proposal does not constitute an expansion of its existing allotment and is not entitled to the same status as a “DTV expansion application” under the priority criteria established in the *Biennial Review Order*.

Furthermore, despite WCSC’s attempt to characterize its pending allotment proposal as a “DTV expansion application,” the mere filing of a rulemaking petition seeking to substitute one DTV channel for another falls far short of constituting an

⁸ Although Fant’s Columbia application previously constituted a “singleton” application, it was not cut-of from additional competing applications until the close of the auction filing window on June 29, 2001, at which time it became subject to additional competing applications, including Grant’s. *See Auction 82 Notice*, p. 1. Thus, Fant’s application does not appear to fall within the third category of protected applications.

⁹ The reference facilities for the existing Channel 52 DTV allotment at Charleston are 1000 kW ERP at 597 meters antenna radiation center height above average terrain with reference coordinates at North Latitude: 32° 55’ 28”; West Longitude: 79° 41’ 58”. These are the identical technical reference facilities specified for the proposed Channel 47 DTV allotment. *Cf.* WCSC’s Petition for Rulemaking, filed May 1, 2000, Engineering Statement, pp. 1-2 *with* NPRM at ¶3.

expansion application. Indeed, the very purpose of this proceeding is to determine whether DTV Channel 47 should be *allotted* to Charleston. Although the FCC's CDBS indicates that WCSC-DT's application to operate on DTV Channel 47 at Charleston was "accepted for filing" on May 17, 2000, the staff's ministerial act of entering WCSC's application into the CDBS cannot override the Commission's longstanding policy of not accepting applications for allotments that do not exist.¹⁰ No application for the proposed digital facility at Charleston can be accepted for filing unless and until DTV Channel 47 is assigned to that community. WCSC's allotment proposal has no status under the priority system established in the *Biennial Review Order* because it applies only to DTV expansion applications. Therefore, because Fant's application for a new NTSC station at Columbia has been accepted for filing in accordance with the procedures established in the *Sixth Further Notice*, it should be entitled to protection from WCSC's pending allotment proposal.

¹⁰ As an example, set forth below are a series of applications for new NTSC stations that were filed with the FCC in July 1996 for which there was no existing allotment. None of these applications was filed for a community located within an area that is subject to the 1987 Freeze Order. In not one instance did the Commission issue a public notice announcing that these applications had been either accepted or tendered for filing:

- In addition to its Columbia application, Fant filed applications for new NTSC stations at Benton, Arkansas (File No. BPCT-19960722__) (Facility ID No. 303262) and Broken Arrow, Oklahoma (File No. BPCT-19960722__).
- Pappas Telecasting of America, A California Limited Partnership, filed applications for new NTSC stations at Vergennes, Vermont (File No. BPCT-19960723__) (Facility ID No. 304764), and Derby, Kansas (File No. BPCT-19960723__) (Facility ID No. 303333).
- Sarah Diaz Warren filed an application for a new NTSC station at Rio Rancho, New Mexico (File No. BPCT-19960724__).
- Oro Valley 52, L.L.C., filed an application for a new NTSC station Oro Valley, Arizona (File No. BPCT-19960723__)
- Pelican Broadcasting Company, Inc., filed an application for a new NTSC station at Cheney, Washington (File No. BPCT-19960723__) (Facility ID No. 304183).

IV. The Proposed Columbia NTSC Station Would Provide Substantially Greater Public Interest Benefits than WCSC's Allotment Proposal.

In the event the Commission should determine that the acceptance for filing of Fant's Columbia application does not, by itself, resolve the conflict between Fant's application and WCSC's allotment proposal, the Commission should resolve the mutual exclusivity by weighing the public interest benefits that would result from the two conflicting proposals. Grant recognizes that the FCC's goal of expediting the implementation of digital television service should be entitled to significant weight. However, affording WCSC's allotment proposal priority over Fant's Columbia application would not further that goal. The sole basis for WCSC's allotment proposal is contained in the following statement:

. . . [T]he proposed channel substitution will enable WCSC to operate on a core channel and would facilitate the use of a common antenna by WCSC-DT and collocated noncommercial educational station WITV-DT, channel 49, Charleston, South Carolina.

Petition for Rulemaking, p. 1.

Although WCSC claims that the proposed channel substitution would "facilitate the use" of a common antenna with Station WITV-DT, there is no evidence to suggest that WCSC-DT could not diplex out of the same antenna with WITV-DT if it were to operate on its assigned DTV Channel 52. Indeed, WCSC's failure to make this allegation is rather conspicuous and strongly suggests that the two stations could share the same antenna if they were to operate on their assigned channels. Thus, the primary purpose behind WCSC's allotment proposal is to obtain an in-core DTV channel, rather than operate on its assigned DTV channel which is outside the core. This is not a case, however, where a licensee is in the unenviable position of having to conduct both its analog and digital operations outside the core and await the assignment of an in-core channel after the end of the transition period upon which to move its digital operation. Instead, WCSC can simply

revert its digital operation to its in-core Channel 5 analog allotment at the end of the transition period. Therefore, a grant of WCSC's allotment proposal would serve merely to promote the licensee's private interests, and would not provide any tangible public interest benefit. Moreover, a grant of the allotment proposal would not expedite the implementation of DTV service in any meaningful way because there is nothing to prevent WCSC from commencing its digital operation on WCSC-DT's assigned DTV Channel 52.

On the other hand, the proposed new NTSC facility at Columbia would bring a new full-power television service and new network service to over half a million people in the Columbia area.¹¹ In addition, the proposed new Columbia NTSC station would (i) help foster competition among the national television networks by providing an opportunity for an emerging network to secure an affiliation with the Columbia station, (ii) promote competition in the local advertising market, (iii) increase ownership diversity in the Columbia market, and (iv) provide an opportunity for new entry into the television broadcast industry. Not one of these public interest benefits can be achieved from the proposal to substitute one DTV channel for another at Charleston.

Furthermore, the proposed Columbia NTSC station would provide the additional public interest benefit of ultimately promoting the overall transition to digital television because, at the end of the transition period -- if not before -- the Columbia station could commence digital operations on its existing in-core Channel 47 allotment.¹²

¹¹ See Engineering Statement of Pete Myrl Warren, Ex. E-FLR-1 (appended hereto).

¹² See, e.g., File No. BPCDT-19960920LH, authorizing Station WHDT-DT, Stuart, Florida, to commence digital operations on its NTSC Channel 59 allotment. Although there are few digital receivers in the market at the present time, the Commission has held that "digital-only" television stations are entitled to mandatory carriage under Section 614 of the Communications Act. *WHDT-DT, Channel 59, Stuart, Florida*, FCC 01-23 (released January 23, 2001).

Therefore, requiring the pending allotment proposal to protect Fant's long-pending application for a new television station at Columbia ultimately would result in *two* digital television stations, rather than only one.

V. In the Event the FCC Were to Conclude that the Charleston Allotment Proposal is Not Required to Protect Fant's Columbia Application, the Competing Applications for the Columbia NTSC Station Should Be Permitted to Proceed to Auction.

Even assuming, *arguendo*, that the FCC were to erroneously conclude that WCSC's allotment proposal is not required to protect Fant's Columbia application, Fant's application and all of the competing applications that were filed in response to the Commission's *Auction 82 Notice* should be permitted to proceed to auction as contemplated by that public notice. The Commission should, however, consistent with WCSC's alternative request,¹³ provide notice to the pending applicants for the Columbia NTSC station that the grant of any authorization for the proposed station will be conditioned upon the acceptance of whatever interference the station may receive from the proposed Channel 47 DTV facility at Charleston.

In the *Sixth Further Notice*, the Commission stated as follows:

While we anticipate that these applications for new NTSC TV stations on existing allotments will not have a significant negative impact on the development of the DTV Table of Allotments, we reserve the right in specific cases, to determine that the public interest is better served if they are not granted, granted only if amended to specify reduced facilities, or granted only with a condition that limits the interference that the station would be allowed to cause.

11 FCC Rcd at 10992.

In this case, the proposed new NTSC station at Columbia will have no impact whatsoever on the proposed allotment of DTV Channel 47 at Charleston. Indeed, the

¹³ See Petition for Partial Rescission, p. 6.

Columbia NTSC station will not cause any interference to the proposed co-channel Charleston digital facility.¹⁴ Thus, consistent with the *Sixth Further Notice*, the proposed Columbia NTSC station will “not have a significant impact on the development of the DTV Table of Allotments.”

Moreover, as demonstrated in Mr. Warren’s attached engineering statement, the proposed Columbia NTSC station is predicted to receive only 4.3% interference from the proposed Charleston DTV station. The predicted interference area is in a sparsely populated area in the southeastern fringe of the Columbia station’s service area, which is far removed from the station’s city of license. See Engineering Statement, Exs. E-2 and E-3. Thus, there is no reason not to permit the pending applications for the new Columbia facility to proceed to auction with an appropriate notice conditioning the grant of the winning bidder’s long-form 301 application upon the acceptance of interference from the proposed co-channel DTV facility at Charleston. The Commission followed a similar procedure in the Blanco, Texas television proceeding.¹⁵ Therefore, because the authorization of a new NTSC station at Columbia would provide substantial public interest benefits and would have no impact upon the development of the DTV Table of Allotments, the Commission should permit the pending applications to proceed to auction in accordance with the *Auction 82 Notice*.

¹⁴ WCSC’s Petition for Partial Rescission makes no claim that Fant’s pending application for a new NTSC station at Columbia would cause any interference to its proposed Channel 47 DTV facility at Charleston.

¹⁵ See *Public Notice*, DA 00-1226 (released June 5, 2000) (advising competing applicants for a new NTSC station at Blanco, Texas, that the winning bidder’s long-form 301 application must protect Class A television stations).

VI. Conclusion.

As demonstrated herein, the priority system established by the Commission in its *Biennial Review Order* does not govern the limited conflict between Fant's Columbia application and WCSC's allotment proposal. Nevertheless, because Fant's application has been accepted for filing in accordance with the procedures established in the *Sixth Further Notice* and the Commission has solicited additional competing applications for the Columbia facility, Fant's Columbia application should be entitled to protection from WCSC's allotment proposal.

In the event the Commission were to conclude that the acceptance for filing of Fant's Columbia application does not, by itself, entitle the application to protection from the pending allotment proposal, Fant's application should be given priority in this allotment proceeding because the proposed new station at Columbia would provide substantial public interest benefits, whereas the substitution of one DTV channel for another at Charleston would merely serve the private interests of WCSC.

Finally, even assuming, *arguendo*, that the Commission were to conclude that Fant's long-pending Columbia application is not entitled to protection from WCSC's allotment proposal, the Commission should permit the pending applications for the proposed Columbia station to proceed to auction because the proposed NTSC station will have no impact whatsoever on the development of the DTV Table of Allotments.

WHEREFORE, in light of the foregoing, Grant Video Inc. respectfully requests that the proposed substitution of DTV Channel 47 for DTV Channel 52 at Charleston, South Carolina, be required to protect the pending application of Fant Broadcast Development, L.L.C. for a new NTSC station to operate on Channel 47 at Columbia, South Carolina.

Respectfully submitted,

Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, N.W.
Washington, DC 20037-1526
(202) 785-9700

Attorneys for

GRANT VIDEO INC.

By: 
Andrew S. Kersting

August 9, 2001

Wes, Inc.

DECLARATION

I, Pete E Myrl Warren, III, declare and state that I am a Certified Broadcast Engineer, by the National Association of Radio and Television Engineers, and my qualifications are a matter of record with the Federal Communications Commission, and that I am an engineer in the firm of Wes, Inc., and that the firm has been retained to prepare an engineering statement on behalf of Grant Broadcasting.

All facts contained herein are true to my knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. All Exhibits were prepared by me or under my supervision. I declare under penalty of perjury that the foregoing is true and correct.



Pete E Myrl Warren, III

Executed on the 9th day of August, 2001

Exhibit E-Eng-1
Engineering Statement
Channel 47 WCSC-DT, Charleston, SC
and Pending Application Study for Columbia, SC
Prepared by Wes, Inc. Broadcast Consultants

The proposed substitution of DTV Channel 47 for the paired DTV Channel 52 allotment assigned to Station WCSC-DT, Charleston, South Carolina, is short-spaced to a pending application filed by Fant Broadcast Development, L.L.C. ("Fant") for a new NTSC station to operate on Channel 47 at Columbia, South Carolina. The attached engineering studies show that the short-spacing would result in only a minimal loss of service to the proposed Channel 47 NTSC facility at Columbia. Thus, the short-spacing would not be critical to the operation of the proposed Columbia station.

The attached Exhibit E-FLR-1, a Longley-Rice Study, shows that the interference from Station WCSC-DT's rulemaking proposal to Fant's proposed operation on NTSC Channel 47 at Columbia would be 4.3%. Exhibits E-2 and E-3 demonstrate that this interference would be limited to a relatively sparsely populated area at the southeastern fringe of the Columbia NTSC station's proposed service area, which is far removed from the proposed NTSC station's city of license. The attached exhibits demonstrate that a grant of WCSC's rulemaking proposal for DTV Channel 47 at Charleston would not cause any material interference to the population who otherwise would receive service from Fant's proposed operation on NTSC Channel 47 at Columbia.

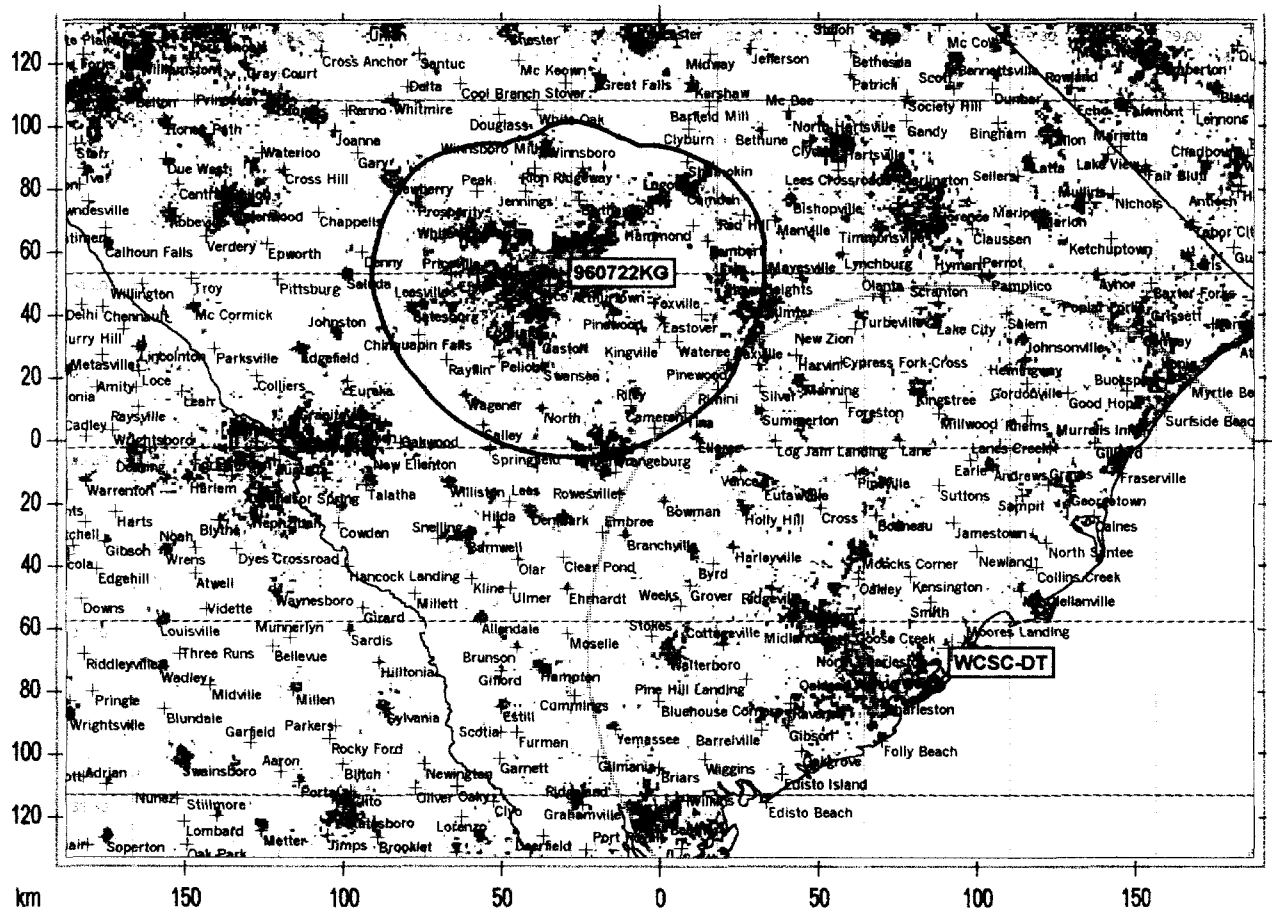
FLR REPORT
Ch 47 WCSC-DT Charleston, SC
Pending Application Study For Columbia, SC
prepared by Wes, Inc. Broadcast Consultants

WCSC-DT N LAT 32-55-28 W LON 79-41-58 ERP:1000 kW AGL:522 m GAMSL: 3 m RCAMSL:525 m

Callsign	City	Class	Status	ERP	Sep Type	Status Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc	Contour	Svc Strength	Int Contour	Int Strength
960722KG	COLUMBIA	Analog	APP	1500	D/M	Interf	173	245	-71.8	34	0	6	2 UHF	47	Z Co	LR	F(50,50)		64	-	-

Population before the addition of WCSC-DT to the database not affected by terrain losses:	627,927 persons
Population lost to NTSC before the addition of WCSC-DT:	100,607 persons
Population after the loss to NTSC	527,320 persons
Population after the addition of WCSC-DT to the database	500,550 persons
Population lost to NTSC with WCSC-DT:	26,770 persons
Percentage of population lost with WCSC-DT	4.3 %

Population Density According to US 2000 Census Data



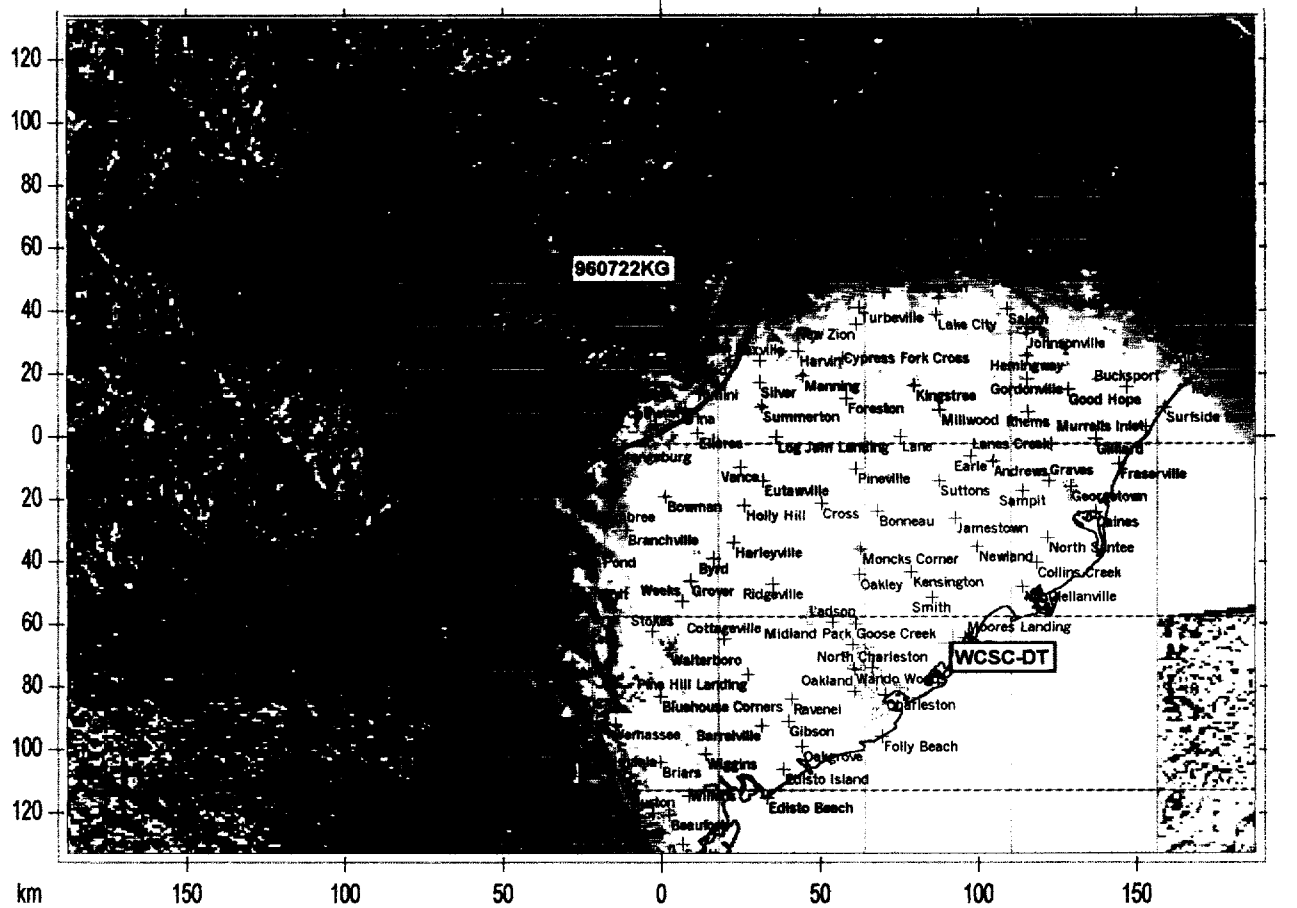
prepared by Wes, Inc. Broadcast Consultants



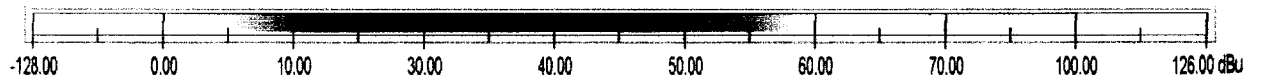
State Borders
 City Borders
 Lat/Lon Grid

Map Scale: 1:2389016 1 cm = 23.89 km V/H Size: 265.58 x 374.80 km

Longley-Rice Field Strength Calculation



prepared by Wes, Inc. Broadcast Consultants



State Borders City Borders Lat/Lon Grid

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of August, 2001, a copy of the foregoing
COMMENTS OF GRANT VIDEO INC. was sent by first-class mail, postage prepaid, to
the following:

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Video Services Division
Mass Media Bureau
Federal Communications Commission
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Washington, DC 20554

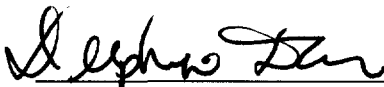
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Delphine Davis

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